

ATTACHMENT 2

SECURITY PLAN

Attachment 2
SECURITY PLAN
[40 CFR 270.14(b)(4), 264.14; UAC R315-3-2.5(b)(4), R315-8-2.5]

1.0 SECURITY PROCEDURES AND EQUIPMENT
[40 CFR 270.14(b)(4), 264.14]

The Ashland Clearfield facility is located within the Freeport Center. This complex is completely fenced around the perimeter and has its own security personnel, who periodically patrol the complex. The Ashland facility is also equipped with a barrier (fence) and has a means to control entry. The facility also maintains a Site Security Plan.

1.1 24-Hour Surveillance System
[40 CFR 270.14(b)(4), 264.14; UAC R315-8-2.5(b)(1)]

Ashland uses the barrier and controlled entry method rather than a 24-hour surveillance system, as described below.

1.2 Methods to Control Entry

1.2.1 Barrier
[40 CFR 270.14(b)(4), 264.14; UAC R315-8-2.5(b)(2)(i)]

The active portion of the plant property is completely enclosed by a six-foot high fence. The fence is of chain link construction. The fence is maintained in good condition.

1.2.2 Means to Control Entry
[40 CFR 270.14(b)(4), 264.14; UAC R315-8-2.5(b)(2)(ii)]

The Ashland Clearfield facility is completely surrounded by a 6-foot high fence, with two entrances to the site through the office and through the main gate, which is the truck access point. The main entrance gate is equipped with a remote control sliding gate, which can be opened and closed from the office. The main entrance gate is generally kept closed at all time except when trucks are entering and exiting the facility. Signs are present to direct visitors to the office upon entering the facility.

The other entrance provides access to the facility by visitors and office personnel via the office during normal business hours (Monday through Friday, 8:00 a.m. to 4:30 p.m.). In addition, the facility is equipped with exterior lighting.

The Freeport Center security personnel patrol the complex and control the complex's main entrance gate during non-working hours. The gates to the

Ashland Clearfield facility are locked during non-working hours and are monitored by the Freeport Center security personnel.

There is a third gate located directly west of the main gate that is kept closed and locked at all times. A fourth gate is an electric railroad and crossover gate to warehouse number J 10. There are two other gates at warehouse J 10; however, there is no access to the main warehouse (i.e., waste pad). All of the aforementioned gates in this paragraph are kept closed and locked unless a transfer of materials to warehouse J 10 occurs or the gates are otherwise in use.

The facility is operated on three overlapping shifts per day, normally on weekdays only.

1.3 Warning Signs

[40 CFR 270.14(b)(4), 264.14; UAC R315-8-2.5(c)]

The gate entrances described above in Section D.1(1)(b)(2) have a sign that states:

"Danger - Unauthorized Personnel Keep Out."

In addition, signs are posted on the fence in sufficient numbers to ensure that one sign can be seen from any direction and is legible from a distance of at least 25 feet. These signs are also posted near entrances to the hazardous waste storage areas.

2.0 WAIVER

[40 CFR 270.14(b)(4), 264.14; UAC R315-8-2.5(b)]

No waiver of the security procedures and equipment requirements is requested for this facility.

2.1 Injury to Intruder

[40 CFR 270.14(b)(4), 264.14; UAC R315-8-2.5(a)]

Ashland prevents the unknowing entry, and minimizes the possibility for the unauthorized entry, of persons and livestock onto the active portion of the facility by a six-foot high chain link fence that is maintained in good condition. Access to the facility is limited to entry through the gates, which are locked during non-working hours. In addition, warning signs are posted along the fence and near the entrances to the hazardous waste storage areas, as described above in Section 1(c).

Ashland employees are issued identification badges and all other visitors are identified prior to accessing the facility. All inbound trucks are required to remain outside of the gate until the paperwork is reviewed and approved. Common carriers provide photo identification issued by their company.

2.2 Violation Caused by Intruder
[40 CFR 270.14(b)(4), 264.14; UAC R315-8-2.5(a)]

Refer to Section 2(a) for a summary of measures taken to prevent injury to or violation caused by an intruder.